



DLA Piper LLP (US)
1251 Avenue of the Americas
27th Floor
New York, New York 10020-1104
www.dlapiper.com

Jonathan Siegfried
jonathan.siegfried@dlapiper.com
T 212.335.4925
F 212.884.8477

February 4, 2019

BY ECF

The Honorable Carol Bagley Amon
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.,*
No. 1:19-cv-00007 (E.D.N.Y. filed Jan. 1, 2019)**

Dear Judge Amon:

We represent Defendants Byblos Bank S.A.L., Bank of Beirut and the Arab Countries S.A.L. and Lebanon & Gulf Bank S.A.L. in the above-referenced action. We write on behalf of all parties (copied below) pursuant to Your Honor's Individual Motion Practices and Rules 2.A and 2.D. Counsel for Plaintiffs and Defendants respectfully request that the Court grant all Defendants an interim extension of time, until February 14, 2019, to negotiate with Plaintiffs a stipulation and proposed order, for the Court's consideration, addressing service of process and the time within which Defendants shall respond to the Complaint.¹ This is the parties' first request for an extension of any kind in this matter.

Defendants are eleven separate foreign financial institutions; they recently learned of this lawsuit and retained U.S. counsel. Counsel for all parties are now engaged in communications in an effort to finalize a joint stipulation that seeks to amicably resolve scheduling and service issues. However, Counsel require several more days to finalize the terms of this stipulation and to obtain the consent of their clients.

All parties expressly reserve all of their respective rights, defenses, privileges, and immunities.

¹ The current docketed response dates, based on the assumption that service via international mail to recipients in Lebanon was proper and sufficient, are as follows: February 4, 2019 (Société Générale de Banque au Liban S.A.L. (ECF No. 32); Fransabank S.A.L. (ECF No. 33); Bank of Beirut and the Arab Countries S.A.L. (ECF No. 34); Bank of Beirut S.A.L. (ECF No. 35); Middle East and Africa Bank S.A.L. (ECF No. 36); Lebanon & Gulf Bank S.A.L. (ECF No. 37); Byblos Bank S.A.L. (ECF No. 38); Bank Audi S.A.L. (ECF No. 39); Banque Libano-Française S.A.L. (ECF No. 40); Jammal Trust Bank S.A.L. (ECF No. 41)); and February 7, 2019 (BLOM Bank S.A.L. (ECF No. 42)).



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We thank the Court, in advance, for its consideration of this joint request.

Respectfully submitted,

/s/
Jonathan Siegfried

cc:

Counsel for Plaintiffs (via ECF):

Gary M. Osen, Esq.
OSEN LLC
2 University Plaza
Suite 201
Hackensack, NJ 07601
(201) 265-6400
gosen@osenlaw.com

Counsel for Defendants BLOM Bank S.A.L. and
Fransabank S.A.L. (via Email):

Linda C. Goldstein, Esq.
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3817
linda.goldstein@dechert.com

Michael H. McGinley, Esq.
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
(215) 994-2000
michael.mcginley@dechert.com

Counsel for Defendant Bank of Beirut S.A.L.
(via Email):

Henry Weisburg, Esq.
hweisburg@shearman.com
Brian H. Polovoy, Esq.
bpolovoy@shearman.com
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022-6069
(212) 848-4193



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Counsel for Defendant Société Générale de
Banque au Liban S.A.L. (via Email):

Michael J. Sullivan, Esq.
ASHCROFT LAW FIRM, LLC
200 State Street, 7th Floor
Boston, MA 02109
(617) 573-9400
msullivan@ashcroftlawfirm.com

Counsel for Defendant Middle East and Africa
Bank S.A.L. (via Email):

Gassan A. Baloul, Esq.
SQUIRE PATTON BOGGS (US) LLP
2550 M Street NW
Washington, DC 20037
(202) 457-6000
gassan.baloul@squirepb.com

Counsel for Defendant Bank Audi S.A.L. (via
Email):

Andrew J. Pincus, Esq.
MAYER BROWN LLP
1999 K Street, NW
Washington, DC 20006
(202) 263-3220
apincus@mayerbrown.com

Counsel for Defendant Banque Libano-Française
S.A.L. (via Email):

Mark G. Hanchet, Esq.
MAYER BROWN LLP
1221 Avenue of the Americas
New York, New York 10020
(212) 506-2500
mhanchet@mayerbrown.com



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Counsel for Defendant Jammal Trust Bank
S.A.L. (via Email):

Christopher M. Curran, Esq.
ccurran@whitecase.com

Nicole Erb, Esq.
nerb@whitecase.com

Claire A. DeLelle, Esq.
claire.delelle@whitecase.com

WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005-3807
(202) 626-3600